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FILED
CLERK, U.S. DISTRICT COURT

10/20/2023

CENTRAL DISTRICT OF CALIFORNIA
BY:

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## UNITED STATES DISTRICT COURT

## FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2023 Grand Jury

CR 2:23-cr-00515-HDV

[18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(5), (6), 2265A: Stalking]

The Grand Jury charges:

UNITED STATES OF AMERICA,

v.

MARK ANTHONY TORRES,

Plaintiff,

Defendant.

[18 U.S.C. §§ 2261A(2)(A), (B), 2261(b)(5), (6), 2265A]

1. Beginning on or about December 18, 2022, and continuing to at least on or about September 29, 2023, in Los Angeles and Orange Counties, within the Central District of California, and elsewhere, defendant MARK ANTHONY TORRES, with the intent to harass and intimidate Victim V.S., used an electronic communication system of interstate commerce and other facilities of interstate commerce, namely, cellular telephone networks, to engage in a course of conduct, described in paragraph 2 below, that placed Victim V.S. in reasonable fear of death and serious bodily injury to herself and an immediate family member, and that caused, attempted to cause, and

would reasonably be expected to cause substantial emotional distress to Victim V.S. and immediate family members of Victim V.S.

- 2. Defendant TORRES'S course of conduct included, among other things, the following:
- a. On or about April 16, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES stated, among other things, "Hey, you fucking dumb bitch ... they're going to fucking kill your fucking ass" and "I'm going to make sure your fucking dad dies."
- b. On or about April 23, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES stated, among other things, "You fucking whore ... You'll fucking see. You're going to fucking get what you fucking have coming."
- c. On or about June 7, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES identified Victim V.S.'s home address and stated, among other things, "Why don't you fucking return your calls you stupid fucking bitch? ... Why didn't you fucking call me instead of just throwing me in jail you fucking stupid ass slut?"
- d. On or about June 23, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES stated, among other things, that he was going to "do every fucking thing that . . . you fucking accused me of" and "Try to have a good day you fucking dead little whore. Fucking dead bitch. Someone is going to fucking kill your ass."
- e. On or about July 8, 2023, defendant TORRES attempted to contact Victim V.S. via telephone at least four times.

- f. On or about July 15, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES stated, among other things, "Hey, you fucking bitch ass whore ... You still live at [Victim V.S.'s home address]? ... You throw me in fucking jail for no reason you fucking piece of shit motherfucking tramp."
- g. On or about July 15, 2023, defendant TORRES left another voicemail for Victim V.S. in which defendant TORRES identified Victim V.S.'s home address and stated, among other things, "I'm going to kill your ass you fucking bitch ass motherfucking slut," "You're going to fucking get exactly what you have fucking coming to you," and "I hope they fucking murder your ass."
- h. On or about July 18, 2023, defendant TORRES attempted to contact Victim V.S. via telephone at least five times.
- i. On or about July 19, 2023, defendant TORRES attempted to contact Victim V.S. via telephone at least three times.
- j. On or about July 20, 2023, defendant TORRES attempted to contact Victim V.S. via telephone at least four times.
- k. On or about August 2, 2023, defendant TORRES attempted to contact Victim V.S. via telephone at least one time.
- 1. On or about September 29, 2023, defendant TORRES left a voicemail for Victim V.S. in which defendant TORRES stated, among other things, "Why don't you answer your fucking phone you stupid fucking dumb bitch? ... Answer your phone when someone calls you, you stupid fucking piece of shit."
- m. On or about September 29, 2023, defendant TORRES left another voicemail for Victim V.S. in which defendant TORRES identified Victim V.S.'s home address and stated, among other things, "I'm going to take whatever the fuck I want. And you're not going to

say shit. You understand? Go run to the fucking FBI, [Victim V.S.]. Go run to the fucking police. Why don't you fucking do that."

- 3. Defendant TORRES engaged in this course of conduct in violation of a restraining and no-contact order, specifically, a Civil Harassment Restraining Order After Hearing issued by the Superior Court of the State of California, County of Orange, in case number 30-2021-01227224, on or about September 26, 2022, which ordered defendant, among other things, not to "[h]arass, intimidate, molest, attack, strike, stalk, threaten" or "[c]ontact ... in any way" Victim V.S. and immediate family members of Victim V.S.
- 4. Defendant TORRES also engaged in this course of conduct after he had been previously convicted of at least one of the following prior domestic violence or stalking offenses:
- (1) Disobeying Domestic Relations Court Order, in violation of California Penal Code Section 273.6(a), in the Superior Court of the State of California, County of Los Angeles, case number 8WC07393, on or about November 8, 2018; and

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1	(2) Violation of a Protective	Order, in violation of California
2	Penal Code Section 166(c)(1), in the	Superior Court of the State of
3	California, County of Los Angeles, case number 8WC08274, on or about	
4	January 23, 2019.	
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6	Z.	A TRUE BILL
7		/0/
8	_	/s/
9		Toreperson
10	E. MARTIN ESTRADA	
11		
12	MACK E. JENKINS Assistant United States Attorney	
13	Chief, Criminal Division	
14	Jagan	
15	SCOTT M. GARRINGER	
16	Assistant United States Attorney Deputy Chief, Criminal Division	
17	IAN V. YANNIELLO	
18	Assistant United States Attorney Deputy Chief, General Crimes	
19	Section	
20	DAVID R. FRIEDMAN Assistant United States Attorney	
21	Criminal Appeals Section	
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